

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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BRUCE D. BARON, Individually and On :
Behalf of All Others Similarly Situated, :
 :
Plaintiff, : 1:25-cv-01877-AMD-LKE
 :
v. :
 :
CANOPY GROWTH CORPORATION, :
DAVID KLEIN, and JUDY HONG, :
 :
Defendants. :
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**STIPULATION AND [PROPOSED] ORDER
REGARDING TIME TO RESPOND TO COMPLAINT AND SCHEDULING**

Plaintiff Bruce D. Baron (“Plaintiff”) and Defendants Canopy Growth Corporation, David Klein and Judy Hong (collectively, “Defendants,” and together with Plaintiff, the “Parties”), by and through their undersigned counsel, hereby stipulate and agree as follows and jointly request that the Court enter the below Order approving this Stipulation:

WHEREAS, on April 4, 2025, Plaintiff filed the above-captioned proposed securities fraud class action against Defendants asserting claims under Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 and Rule 10b-5 promulgated thereunder (ECF No. 1);

WHEREAS, no Defendant has been served and undersigned counsel for Defendants is authorized to accept, and hereby does accept, service of the Complaint on behalf of each Defendant without prejudice to or waiver of any defenses, objections or arguments, except as to the sufficiency of service of process;

WHEREAS, this action is governed by the Private Securities Litigation Reform Act of 1995 and its procedures for the appointment of lead plaintiff and approving lead counsel

after a 60-day notice period expires following publication of notice of the filing of this action, 15 U.S.C. § 78u-4(a)(3)(A);

WHEREAS, lead plaintiff motions are currently due by June 3, 2025 and the Parties expect that after the Court appoints a lead plaintiff pursuant to 15 U.S.C. § 78u-4(a)(3)(B), the lead plaintiff will file an amended complaint that will supersede the Complaint;

WHEREAS, the Parties agree that extending Defendants' time to respond until after a lead plaintiff is appointed and an amended complaint is filed will promote efficiency and help conserve resources; and

WHEREAS, this is the first request for an enlargement of time to respond to the Complaint and Plaintiff consents to this request.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, and respectfully requested, by and among the undersigned counsel for the respective Parties, subject to approval of the Court, that:

1. Defendants do not need to respond to the Complaint until after the appointment of lead plaintiff(s), absent further order of the Court; and
2. Within fourteen (14) days following entry of an order by the Court appointing a lead plaintiff(s) in this action (or a consolidated action encompassing the above-captioned action) pursuant to 15 U.S.C. § 78u-4(a)(3), counsel for each of the respective Defendants and lead counsel shall confer and submit a schedule for the filing of an amended complaint, if any, and Defendants' response thereto.

Dated: New York, New York
April 25, 2025

/s/ Jeremy A. Lieberman

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*Counsel for Defendants
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David Klein, and Judy Hong*

IT IS SO ORDERED.

Dated: _____, 2025

ANN M. DONNELLY
UNITED STATES DISTRICT JUDGE